



Power Electronics for Industry

Composite Modules, Inc. • 61 Union Street • Attleboro, MA 02703
Telephone: (508) 226-6969 • FAX: (508) 226-0938 • E-mail: sales@cmodules.com

Dwight Peavey, Small Business Ombudsman
US EPA - New England (SPT)
One Congress St., Suite 1100
Boston, MA 02114-2023

June 20, 2003

Subject: Small Business Policy Self-Disclosure

Dear Mr Peavey,

This Self-Disclosure letter is to inform you that during a self-audit on June 09, 2003, it was discovered that the 2002 Tier 2 Report due March 1, 2003 had yet to be filed. Composite Modules, Inc. requests coverage under EPA's Small Business Policy (also known as Policy On Compliance Incentives For Small Businesses) for self-reporting this violation.

Composite Modules, Inc., is located at 61 Union Street in Attleboro, Massachusetts (Dun & Bradstreet # 620478511) and employs approximately 75 people.

The Tier 2 forms have since been completed and will be mailed to the appropriate agencies.

Sincerely,

Robert Caesar
Controller

From: Edward Hsieh, Rose Toscano
To: Composite Modules, Inc.
Date: May 20, 2004

Subject: Composite Modules, Incorporated Small Business Self-Disclosure Summary and Penalty Calculation

Background

In a letter dated June 20, 2003, Robert Caesar, on behalf of Composite Modules, Incorporated ("Composite") self-disclosed failure to file an EPCRA Section 312 - Tier II Report for 2002 due March 1, 2003. Composite discovered the violation during a self-audit on June 09, 2003 and subsequently filed the Tier II Report on June 19, 2003.

Based on its Tier II Report and information collected from Robert Caesar, Composite lists Anhydrous Ammonia as its sole EHS chemical and reports an on-site poundage for the EHS averaging 6k and not exceeding 10K. EPCRA Section 312 requires submission of Tier II reports for EHS inventory in excess of 500 pounds. Composite's EHS inventory exceeds by more than ten times the reporting threshold.

Composite voluntarily discovered, disclosed and corrected the above violation of EPCRA Section 312 - Tier II reporting requirements. The company has provided relevant information in a timely fashion. There are no prior violations of EPCRA 312 involving Composite. Composite gained no economic benefit.

EPCRA Section 312 Penalty Calculations

As required by Regional audit guidelines the following provides theoretical penalties. The Enforcement Response Policy effective September 30, 1999 was used to determine the Extent/Gravity of the violation.

Gravity-Based penalties are based on:

Number of days late: >30 days
Amount of EHS relative to RQ: >10X (10 times; Level A = $500 \times 10 = > 5,000$ lbs
Reported Quantity = 6,000-10,000 lbs.)

Extent Level 1 and Gravity Level A under EPCRA Section 312.

Therefore the Penalty is within the range \$20,626 - \$27,500.

The Mitigated Penalty is \$20,626 and erred towards the lower end of the range, since the violation did not present an imminent and substantial endangerment to public health, safety or the environment.

Composite has met all 4 criteria of the Small Business Compliance Policy which qualifies it for a waiver of Civil penalties.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

**1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023**

May 20, 2004

Robert Caesar
Composite Modules, Inc.
61 Union Street
Attleboro, MA 02703

Subject: Small Business Self-Disclosure; Request for Additional Information

Dear Mr. Caesar:

The United States Environmental Protection Agency (EPA) is in receipt of your letter, dated June 20, 2003, in which you disclosed violations and/or potential violations at your facility in Attleboro, Massachusetts. EPA appreciates your willingness to self-police, disclose, and correct violations in a timely manner.

As discussed in EPA's final policy statement entitled, "Incentives for Self Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Fed. Reg. 19617, (April 11, 2000) ("Self-Disclosure Policy"), EPA will not pursue gravity-based penalties for violations that are discovered through an environmental audit or compliance management system, voluntarily disclosed to EPA and promptly corrected when certain criteria are met. The purpose of this letter is to request that you provide certain information to EPA so that the Agency can determine whether the criteria of Self-Disclosure Policy are met and thus whether you are entitled to the incentives provided by that policy. Notwithstanding this letter, EPA reserves the right to take action pursuant to any applicable federal enforcement authority.

The following are questions for which your response is needed by the Agency.

1. The name for each specific chemical or chemical category for which a disclosure is being made
2. CAS number(s)
3. Maximum quantity of chemical(s) on site at any one time (in lbs)
4. Year(s) on site.
5. Copies of all EPCRA report(s) filed
6. Provide an estimate of total corporate entity sales and number of employees.
7. Did the violation cause actual, serious harm or present imminent and substantial endangerment, to public health, safety or the environment?
8. Did the violation involve criminal conduct?

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

SMALL BUSINESS SELF-DISCLOSURE CASE REVIEW

Case Officer: Edward Hsieh, Rose Toscano

Attorney of Record: Joel Blumstein

Date: 05/20/04

FACILITY: Composite Modules Inc

Represented by: Robert Caesar

Date of Disclosure: June 20, 2003

Type of Violation: EPCRA 312

NUMBER OF EMPLOYEES: 75

ESTIMATED SALES: \$20 to \$50 million

SMALL BUSINESS AUDIT POLICY CHECKLIST

1) VOLUNTARY DISCLOSURE: (✓ if true; X if not the case with this review, or ? If unable to determine at this time)

☒ The violation(s) was identified before an EPA or state inspection. (A small business may discover violations after receiving compliance assistance, conducting an environmental audit or participating in mentoring programs.

☒ The violation(s) was identified voluntarily, and not through a legally mandated monitoring or sampling requirement prescribed by statute, regulation, permit, judicial or administrative order, or consent agreement.

For example, the policy does not apply to:

- a) emissions violations detected through a continuous emissions monitor (or alternative monitor established in a permit) where any such monitoring is required; X
- b) violations of National Pollutant Discharge Elimination System (NPDES) discharge limits detected through required sampling or monitoring; X
- c) violations discovered through a compliance audit required to be performed by the terms of a consent order or settlement order. X

2) PROMPT DISCLOSURE: (✓ if true; X if not the case with this review, or ? If unable to determine at this time)

☒ The small business fully disclosed a specific violation within 21 days after it has discovered that the violation has occurred, or may have occurred in writing to EPA;

☒ The disclosure of the violation(s) occurred before the violation(s) was otherwise discovered by, or reported to EPA, the appropriate state or local regulatory agency.

3) CORRECTION AND REMEDIATION:

☒ The small business corrected the violation(s) **within 90 days of its discovery**, certifies in writing that violations have been corrected, and takes appropriate measures as determined by EPA to remedy any environmental or human harm due to the violation(s).

OR

☐ If the violation(s) **could not be corrected within 90 calendar days of its discovery**, the small business submitted to EPA a written schedule before the 90-day period expired.

☐ The small business corrected the violation(s) **within 180 days**, certified in writing that violations have been corrected and took appropriate measures as determined by EPA to remedy any environmental or human harm due to the violation(s).

☐ The small business intends to correct the violation by putting into place pollution prevention measures, and may take an additional period of up to 180 calendar days from the date the violation is discovered.

4) NO REPEAT VIOLATIONS AND OTHER VIOLATIONS EXCLUDED:

The facility has the following compliance history:

- a) The small business has not received a warning letter, notice of violation, or field citation, or been subject to a citizen suit or any other enforcement action by a government agency for a violation of the same requirement **within the past three years**; ☒
 - b) The small business has not been granted a penalty reduction under the Small Business Policy (or a similar State or Tribal policy) for a violation of the same or a similar requirement **within the past three years**; ☒
 - c) The small business has not been subject to two or more enforcement actions for violations of environmental requirements **in the past five years**, even if this is the first violation of this particular requirement. ☒
- ☒ The violation was not discovered through an information request, inspections, field citations, reported to a federal, state or local agency by a member of the public or a "whistle blower" employee, identified in notices of citizen suits, previously reported to an agency, or through an investigation (unless the facility can demonstrate that it did not know that the agency had initiated the investigation and has disclosed in good faith).
- ☒ The violation has not caused actual serious harm to public health, safety or the environment.
- ☒ The violation is not one that may present an imminent and substantial endangerment to public health, safety or the environment.
- ☒ The violation did not involve criminal conduct.

**** NO ECONOMIC BENEFIT**

Name: **Edward Hsieh, Rose Toscano**
 Phone: **617-918-1832**
 Date: **May 20, 2004**

A. Case and Facility Background

1. OECA DOCKET System #: _____
2. Court Docket/Regional Hearing Clerk Administrative Docket #: _____
3. Cases name: _____
- Information for one Facility: (If more facilities, attach additional pages.)
- 4(a) EPA Program ID # for the facility: _____
- 4(b) EPA-FLA #: _____ (If (a) not available or applicable)
5. Facility Name: Composite Modules, Inc.
6. Facility Address: 61 Union St City: Attleboro State: MA Zip: 02703
- 7(a) Primary 4-digit SIC-code: _____ (b) Other 4-digit SIC-codes: _____, _____, _____
- 8(a) EPA Lead Attorney: J. Blumstein
- 8(b) EPA Program Contact: Rose Toscano / Edward Hsieh
9. Statute(s) and Section(s) violated (Not authorizing section or CFR): ERRA / N313, 312
10. Authorizing section for administrative actions: _____
11. Action Type

- ☐ (a) Consent decree or court order resolving a civil judicial action
- ☐ (b) Administrative Penalty Order (with/without injunctive relief)
- ☐ (c) Superfund administrative cost recovery agreement
- ☐ (d) Federal facility compliance agreement (not incl. RCRA matters)
- ☐ (e) Field citation
- ☐ (f) Administrative Compliance Orders
- ☒ (g) Notice of Determination

12. Administrative action date: _____ Issued/Filed _____ Final Order _____
- OR- Civil Judicial action date: _____ Settlement Lodged _____ Settlement Entered _____

13. Was this a multi-media action? ☐ Yes ☒ No
- Check all that apply/make this action multi-media: ☐ inspection ☐ complaint ☐ settlement ☐ SEP
14. Was the Agency activity taken in response to Environmental Justice concerns? ☐ Yes ☒ No
- Check all that apply: ☐ Low Income ☐ Minority Population ☐ Low Income & Minority Population ☐ Other
15. Was Alternative Dispute Resolution used in this action? ☐ Yes ☒ No
16. If this action was taken as part of a MOA Priority Activity, it should be reported by SIC on the Facility Information Screen and, where necessary, through the Violation Information Screen using the appropriate code noted in brackets. (See Section One of RECAP for full list of MOA Measures and the DOCKET Data Element Dictionary for additional violation type Definitions).

Wet Weather: CSO (CSO) _____; CAFO (AFLOT) _____; Stormwater (STORM) _____;

Petroleum Refining - Refinery Fuel Gas (REFFG) _____; LDAR (LDAR) _____; Benzene Waste (BENZW) _____;

Iron and Steel - SIC Code 3312, 3315, 3316, 3317 and for unregulated wastes (UNREG) _____; KO61 Noncompliance (RKOGI) _____;

Primary NonFerrous Metals: SIC Code: 3331, 3334, 3339; and for Bevil enforcement actions (BEVIL) _____;

Chemical Sector: SIC 2869, 2899 _____;

SDWA Microbial: TCR violations (PWTCR) _____; SWTR violations (SWTR) _____;

Metal Services: SIC 3471, 3479 _____;

RCRA Permit Evaders: (RCRPE) _____; and for misidentified wastes (RMISWT) _____;

CAA Air Toxics and NSR/PSD: (NSR) _____; (PSD) _____ (Coal-Fired Power Plant) SIC 4911, 493 _____;

21. SEP description:

22. Cost of SEP. Cost as calculated by the Project Model: \$
Actual expenditures required under CAFO: \$
Annual operating expenses: \$
Number of years of required operation:
Settlement amount (adjusted penalty [final penalty + SEP credit]): \$
Credit granted for SEP: \$
Percentage reduction (SEP credit ÷ settlement amount)

23. Is Environmental Justice addressed by SEP? ☐ Yes ☒ No
If yes, explain how.

24. Quantitative environmental impact of SEP: pollutants and/or chemicals and/or waste-streams, and amount of reductions/eliminations (e.g., emissions/discharges) on annual basis.

Pollutant	Amount	Units (gallons, tons)	Percentage Reduction	Medium
			%	
N/A				

If environmental benefit is not quantified, explain benefit to environment or human health here:

D. Penalty (if there is no penalty, enter 0 and proceed to #27)

25(a) Assessed Penalty (cash) \$ 0
25(b) (if shared) Federal share \$
25(c) (if shared) State or Local share \$
26. For multi-media actions, Federal amounts by statute: Statute

**MITIGATED PENALTY PER
DISCLOSURE
POLICY \$20,626**

Amount

\$
\$
\$

E. Cost Recovery N/A

27. Amount cost recovery awarded:
\$ EPA
\$ State and/or Local Government
\$ other

Please attach additional Conclusion Sheets or sheets of paper to provide information which does not fit on initial Case Conclusion Data Sheet.



U.S. Environmental Protection Agency Enforcement & Compliance History Online (ECHO)

[Recent Additions](#) | [Contact Us](#) | [Print Version](#)
[EPA Home](#) > [Compliance and Enforcement](#) > [ECHO](#) > [Search Data](#) > Detailed Facility Report

Detailed Facility Report

[Report Error](#)
[Data Dictionary](#)

For Public Release - Unrestricted Dissemination Report Generated on 05/20/2004
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Facility Permits and Identifiers

[Data Dictionary](#)

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110000496026	COMPOSITE MODULES INCORPORATED	61 UNION ST.	ATTLEBORO	MA	02703
CAA	AFS	2512000012	COMPOSITE MODULES INC	1 MILL ST	ATTLEBORO	MA	02703
RCRA	RCR	MAD059739110	COMPOSITE MODULES INC.	61 UNION STREET	ATTLEBORO	MA	02703
EP313	TRI	02703CMPST1MILL	COMPOSITE MODULES INC.	61 UNION ST.	ATTLEBORO	MA	02703

Facility Characteristics

[Data Dictionary](#)

Statute	Source ID	Facility Status	Permit Expiration Date	Lat/Long	Indian Lands?	SIC Codes	NAICS Codes
	110000496026			LRT lat: 41.9426 LRT long: -71.2851	NA		
CAA	2512000012	Operating, Minor (Not Fed.Rep.)			NA	3460	
RCRA	MAD059739110	LQG			No	3521	334419
EP313	02703CMPST1MILL			lat: 41.9425 long: -71.2828	NA	3679	

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

Inspection and Enforcement Summary Data

[Data Dictionary](#)

Statute	Source ID	RECAP Insp. Last 02Yrs	Date of Last Inspection	Formal Enf Act Last 02 Yrs	Penalties Last 02 Yrs
CAA	2512000012	0	12/11/2000	0	\$00
RCRA	MAD059739110	0	08/13/1998	0	\$00

Inspection History (02 years)

[Data Dictionary](#)

Statute	Source ID	Inspection Type	Lead Agency	Date
- No data records returned.				

Entries in *italics* are not considered inspections in Reporting for Enforcement and Compliance Assurance Priorities (RECAP) official counts.

Compliance Summary Data

[Data Dictionary](#)

Statute	Source ID	Current SNC/HPV?	Current As Of	Description	Qtrs in NC (of 8)
CAA	2512000012	N/A	04/17/2004		
RCRA	MAD059739110	NO	04/19/2004		0

Two Year Compliance Status by Quarter

[Data Dictionary](#)

Violations shown in a given quarter do not necessarily span the entire 3 months.

AIR Compliance Status								
Statute:Source ID CAA: 2512000012	QTR1 Jul-Sep02	QTR2 Oct-Dec02	QTR3 Jan-Mar03	QTR4 Apr-Jun03	QTR5 Jul-Sep03	QTR6 Oct-Dec03	QTR7 Jan-Mar04	QTR8 Apr-Jun04
HPV History								
Program/Pollutant in Current Violation								
SIP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP	C-INSP

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. C=Compliance; V=Violation; S=Compliance Schedule.

Formal Enforcement Actions - AFS, PCS, RCRAInfo, NCDB (02 year history)

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

EPA Formal Enforcement Actions - ICIS (02 year history)

[Data Dictionary](#)

Primary Law/Section	Case Number	Case Type	Case Name	Issued/Filed Date	Settlement Date	Penalty	SEP Cost
- No data records returned.							

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS). These actions may duplicate records in the Formal Enforcement Actions section.

Demographic Profile of Surrounding Area (3 Miles)

[Data Dictionary](#)

Open more detailed information in a new window (links leave ECHO): [1 Mi](#) [3 Mi](#) or [5 Mi](#).

This section is to provide context regarding the community setting of the facility. No relationship between this information, and other data included in this report is implied. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA [Locational Reference Table \(LRT\)](#) when available.

Radius of Area:	3 Miles	Land Area:	96.89%	Households in area:	14,944
Center Latitude:	41.9426	Water Area:	3.11%	Housing units in area:	15,435
Center Longitude:	-71.2851	Population Density:	1440.50/sq. mi.	Households On Public Assistance:	325
Total Persons:	39,441	Percent Minority:	10.95%	Persons Below Poverty Level:	2,334

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	35,975 (91.21%)	Child 5 years and less:	3,387 (8.59%)
African-american:	740 (1.88%)	Minors 17 years and younger:	10,094 (25.59%)
Hispanic-Origin:	1,652 (4.19%)	Adults 18 years and older:	29,347 (74.41%)
Asian/Pacific Islander:	1,227 (3.11%)	Seniors 65 years and older:	4,674 (11.85%)
American Indian:	53 (0.13%)		
Other/Multiracial:	630 (1.60%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	1,340 (5.51%)	Less than \$15,000:	1,731 (11.58%)
9th-12th grades:	2,818 (11.60%)	\$15,000-\$25,000:	1,302 (8.71%)
High School Diploma:	8,120 (33.41%)	\$25,000-\$50,000:	3,977 (26.61%)
Some College/2-yr:	4,755 (19.57%)	\$50,000-\$75,000:	3,772 (25.24%)
B.S./B.A. or more:	7,270 (29.91%)	Greater than \$75,000:	4,191 (28.04%)

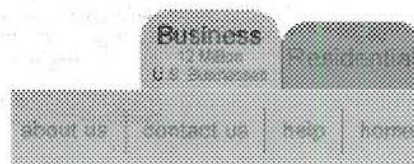
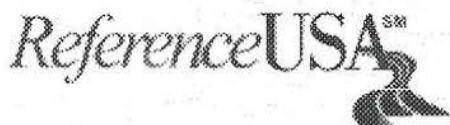
Please note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

 **Map Returned Facility**

This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 04/17/2004. RCRAInfo: 04/19/2004. FRS: 04/15/2004. TRI: 04/08/2004. ICIS: 04/15/2004.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

[EPA Home](#) | [Privacy and Security Notice](#) | [Contact Us](#)


[Back](#)
[Revise My Criteria](#) [New Search](#)

Detailed Listing

Name:	COMPOSITE MODULES INC	Employees:	Corporate Location 50 to 99
Address:	61 UNION ST	Est Sales:	\$20 to \$50 MILLION
City:	ATTLEBORO, MA 02703-2936	Location:	SINGLE LOC
Contact:	ROBERT JONES (OWNER)	Credit Rating Code*:	EXCELLENT
County:	BRISTOL	ABI Number:	474323292
MSA (Metro Area):	BOSTON, MA-NH	Public:	No
Phone:	(508) 226-6969	Ticker Symbol:	Not Available
Fax**:	(508) 226-0938	Toll Free Number:	Not Available
Fortune 1000 Ranking:	Not Available	URL:	Not Available
Foreign Parent:	NO		

SIC	Lines of Business	Ad Size	Year Appeared in YP
3674-01	SEMICONDUCTOR DEVICES (MANUFACTURERS)	REGULAR	1993

NAICS	Lines of Business
33441302	SEMICONDUCTORS & RELATED DEVICES MFG

Name	Title	Gender
KATHY JORGENSEN	FINANCE EXECUTIVE	FEMALE
ROBERT CAESAR	HUMAN RESOURCES EXECUTIVE	MALE
TIM HICKEY	SALES EXECUTIVE	MALE

Map It!

Add to List

Show Businesses Within

All Businesses

Show SIC's Within

SIC Search

* Our Credit Rating Codes are indicators of probable ability to pay. They are based on business demographic factors such as number of employees, years in business, industry stability, bill paying history, barriers to entry, and government data. We recommend that these ratings be used primarily as a starting point and should not be the sole factor used in making a credit decision. You must obtain more information from bank and trade references, local credit bureaus, or other sources before extending credit. We will not be liable for any losses resulting from the use of this information.

** It is a violation of both federal and state law to transmit an unsolicited advertisement to a facsimile machine. Any person violating such laws may be subject to civil and criminal penalties which may exceed \$500 for each transmission of any unsolicited facsimile. We provide



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

JUN 3 2004

Robert Caesar
Composite Modules, Inc.
61 Union Street
Attleboro, MA 02703

Subject: Small Business Self-Disclosure of Violations at Composite Modules, Incorporated,
located in Attleboro, MA.

Dear Mr. Caesar:

The United States Environmental Protection Agency (EPA) has completed review of your letter dated June 20th, 2003 in which you disclosed violations of the Emergency Planning and Community Right-to-Know Act (EPCRA) Section 312 with respect to the submission of Tier II chemical inventory reports by Composite Modules, Inc. at its facility located in Attleboro, Massachusetts. Your letter and subsequent phone conversations with an EPA representative describe the circumstances of the discovery of the violation and the actions the company has taken to correct and prevent recurrence of such violations.

On June 3, 1996, EPA issued the "Policy on Compliance Incentives For Small Businesses" (Small Business Policy). The policy was modified on April 2000. The policy states that EPA will waive or reduce civil penalties for violations that are voluntarily discovered, promptly disclosed to EPA and promptly corrected when certain criteria are met. The Small Business Policy also states that EPA will retain its discretion to recover the economic benefit of noncompliance if such economic benefit is significant in order to maintain an even playing field among the regulated community.

However, based solely on the information currently known to EPA, the Agency has determined that the Small Business Policy applies to the violation that you have described. Thus, EPA will not seek gravity-based penalties or recovery of economic benefit because your company discovered, disclosed, and corrected the violations in accordance with the Small Business Policy, and no significant economic benefit was gained by your company from these violations. This determination of the applicability of the Small Business Policy is conditioned on the truthfulness and accuracy of your disclosure and is limited to the specific violation which you have disclosed.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

EPA appreciates the willingness of Composite Modules, Inc. to self-police, voluntarily disclose and correct violations under the Small Business Policy. If you have any questions regarding this letter, please contact Joel Blumstein at (617) 918-1771.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen S. Perkins". The signature is fluid and cursive, with the first name "Stephen" being more legible than the last name "Perkins".

Stephen S. Perkins, Director
Office of Environmental Stewardship

cc: Joel Blumstein
Rose Toscano

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023**CERTIFIED MAIL
RETURN RECEIPT REQUESTED****JUN 3 2004**Robert Caesar
Composite Modules, Inc.
61 Union Street
Attleboro, MA 02703Subject: Small Business Self-Disclosure of Violations at Composite Modules, Incorporated,
located in Attleboro, MA.

Dear Mr. Caesar:

The United States Environmental Protection Agency (EPA) has completed review of your letter dated June 20th, 2003 in which you disclosed violations of the Emergency Planning and Community Right-to-Know Act (EPCRA) Section 312 with respect to the submission of Tier II chemical inventory reports by Composite Modules, Inc. at its facility located in Attleboro, Massachusetts. Your letter and subsequent phone conversations with an EPA representative describe the circumstances of the discovery of the violation and the actions the company has taken to correct and prevent recurrence of such violations.

On June 3, 1996, EPA issued the "Policy on Compliance Incentives For Small Businesses" (Small Business Policy). The policy was modified on April 2000. The policy states that EPA will waive or reduce civil penalties for violations that are voluntarily discovered, promptly disclosed to EPA and promptly corrected when certain criteria are met. The Small Business Policy also states that EPA will retain its discretion to recover the economic benefit of noncompliance if such economic benefit is significant in order to maintain an even playing field among the regulated community.

However, based solely on the information currently known to EPA, the Agency has determined that the Small Business Policy applies to the violation that you have described. Thus, EPA will not seek gravity-based penalties or recovery of economic benefit because your company discovered, disclosed, and corrected the violation in accordance with the Small Business Policy, and no significant economic benefit was gained by your company from this violation. This determination of the applicability of the Small Business Policy is conditioned on the truthfulness and accuracy of your disclosure and is limited to the specific violation which you have disclosed.

CONCURRENCES							
SYMBOL	065	085	SEL				
SURNAME	Toscano	DeWard	B. L. H.				
DATE	5/20/04	5/24/04	6/11/04				